TENTATIVE AGREEMENT ON FACILITY TRANSITION
THE DALLES, OREGON
Shilo Inn
Tuesday, February 21

Attendees:

Dennis Faulk, Facilitator, U.S. Environmental Protection Agency (DF)
Paul Krupin, Lead Negotiator, U.S. Department of Energy (PK)
Tom Tebb, Negotiator, Washington State Department of Ecology (TT)
Mary Lou Blazek, Hanford Advisory Board and Oregon Hanford Waste Board member (MB)
Dirk Dunning, Oregon Hanford Waste Board (DD)
Dick Belsey, Oregon Hanford Waste Board and Hanford Advisory Board member (DB)
Jack Waite, Westinghouse Hanford Company, facility transition negotiation support staff (JW)

MB: Hello, I'm Mary Lou Blazek of Oregon's Hanford Waste Board. Oregon Hanford Waste Board has been concerned about Hanford issues that have an impact on the lives of Oregonians since 1988. And we are meeting here in The Dalles today and tomorrow. Oregon has played a big part in changing the way things are done at Hanford. Oregon through its Senator essentially closed down the N Reactor by cutting appropriations. Also, in the course of a tight election campaign the DOE decided to close the PUREX Plant so that to give the Senator more stature and help him win that election. So we are delighted that the DOE and the Regulators and the contractors are here tonight to bring the issues of this particular problem to Oregonians and to allow them and also people from across the river and down the river to have a say and to reflect on things that are going to effect them and their kids, kids for the decade if not for the millennium. So I welcome you and I would like to introduce Dennis Faulk from the U.S. Environmental Protection Agency who will work tonight as the moderator of this meeting. Dennis.

DF: Since we have such a small group I think I am just going to step out here and talk to you and hopefully I can be picked up on the monitor. What we have tonight for you is a presentation of Facility Transition. We are here to get your comments on the Facility Transition program. Tom Tebb from the Department of Ecology will give you a short presentation on that and then we will open up for questions and answers. We will also have Paul Krupin from the U.S. Department of Energy. On the back over there you will see a poster board that shows the major facilities that we are going to be discussing tonight. And we have information over on this table, including the tentative agreement which is in the orange binding. Without any further adieu I will turn it over to Tom for the presentation.

TT: Good evening. I am here tonight to talk about the summary of the Tentative Agreement on Facility Transition. The agreement essential represents six to seven months of work and negotiating, schedules that were established through the agreement in principal, which I believe is on the next slide. In that agreement in principal we provided a form work to address four key facilities. Those facilities are the Plutonium Uranium Extraction Plant or PUREX, the Uranium Trioxide Plant or UO_3, the Fast Flux Test Facility or FFTF and the Plutonium Reduction Reclamation, or PRF, and the oxide processing lines within the Plutonium Finishing Plant or PFP, I am going to keep referring to all of these

acronyms. I am trying not to, I am actually going to try and spell out and say the name of the facility. If I do, you have to stop me.

Essentially, the negotiation objectives were to reduce costs, minimize the costs of these facilities and maintenance. The other objectives were to minimize the wastes that these facilities would generate during this process. Other things were to set aggressive schedules for transition of these facilities through the process. And that those transitions schedules and activities would need to be coordinated throughout the site and in a coordinated fashion. And in addition we wanted to design a way a process if you will that any new facility could enter into or be part of the decommissioning process that we designed. Also to ensure that these facilities, once transitioned, were looked at on a biannual basis for review for final disposition as needed.

The scope of the negotiations also included developing the facility decommissioning process. We have over here on the charts we have described a graphical flow map of that process that has, if you will, a flow diagram that shows the key components of this process. Essentially the process has three main components. The transition phase which takes this facility from its current hot operational stand by status, if you will, to a low risk, low maintenance, low environmental risk and cost. Once it achieves that status, it then goes into a phase they call a bridge, or the surveillance maintenance phase. It will be in that phase until such time that the Department of Energy and other stakeholders determine that the facility will go into a final disposition phase. The work schedules were essentially designed around four plants I described earlier. The Uranium Trioxide Plant or the UO_3, the Plutonium Uranium Extraction Plant or the PUREX plant, the Fast Flux Test Facilities, FFTF and the Plutonium Finishing Plant, or PFP. We will also address other issues in the negotiations. We wanted to address highly radioactive mixed waste management issues that exist throughout the site in various locations and not just specifically at these facilities but other areas. We also wanted to integrate language in the agreement such that cross-programmatic integration would occur and we would have a more coordinated cleanup. We also have...

MB: What is programmatic integration?

TT: It is where you have an organization like facility transition requesting budget numbers or budgets, and that working as a whole with Hanford Site Tank Waste Remediation System or with the Environmental Restoration program. Each one of those, if you will, has been called a stovepipe, and they don't always talk amongst each other at the higher levels to coordinate a cleanup activity for the whole site. So that is what we try to put into the language of this agreement. (voice faded out)...that were generated as result of this decommissioning process. This new section can be found in the proposal agreement. It will be under Section 14. It establishes that a process where key facilities are closed under present or CERCLA processes will be addressed. And it takes those processes and integrates this RCRA -- stands for Resource Conservation and Recovery Act; CERCLA stands for Comprehensive Environmental Response Liability Act, I think that is correct. Essentially Superfund and the process under RCRA. Anyway, it takes these two processes, these two environmental processes, and interjects with them the DOE Facility Decommissioning process to integrate those two. In the tentative agreement, it was deliberated that the parties must approve the physical condition of the facilities once they finish a facility transition.

MB: You might explain why now.

TT: Well, it's an important component in that the Department of Energy may perceive a certain tank system, or flushing system's complete, whereas we have entered into a data quality objective process, or process whereby we've defined what we believe would be an empty tank system, or piping systems, so we need both to agree upon when the work is finished, and that was a key component of the agreement. Does that help a little bit? It does. We also essentially deferred the RCRA units' closure until such time as the final disposition of the facility occurs. Now what that means is that if, for some reason, a facility is in a surveillance and maintenance mode for 10, 20, or 30 years, that closure of that RCRA unit would not occur until the final facility disposition process would occur. Like, okay, what that means is that if DOE determines to tear the facility down, or if they have some other way of closure, like clean closure or as a surface impoundment, then it would go under the RCRA process for closure of those TSD (treatment, storage and disposal) units within the facility or part of the facility.

DF: (Explain what TSD is . . .)

TT: Treatment, storage and disposal facility.

UV: May I point out what this is really trying to do is allow the Department of Ecology and EPA to come to agreement on when to spend money to address...(not audible) and what it does is allow money to be spent on the higher risk.

TT: I think on the same line, I think what will hopefully remain is these islands of purity in a very contaminated area. Under the closure program, you might have to close one facility; does that make sense if all the other facilities right next to it is still contaminated? See what this also does, because a RCRA closure forces you to go to a new area in a very short period of time, this allows you to avoid spending money when the risk doesn't warrant it, when you have greater risks out there that you want to work on.

TT: Also in this agreement, Ecology and EPA retain the right to require closure or clean up of a facility at any time, and if, for example, some sort of an event, or an emergency out there, or where something happened, we could say it's time to clean this up. It's presenting an environmental risk and health safety concern. And also in the process we've designed a review, a bi-annual review where additional negotiations, if necessary could be entered into. I'm going to go right into the plants now. We have a picture of the Uranium Trioxide Plant, and this facility has essentially gone through the transition phase and is now in the surveillance and maintenance phase. So we're ahead of schedule.

MB: That was due to happen in June of 1995.

TT: Right. The next slide graph is the PUREX plant or the Plutonium Uranium Extraction Plant. The end point for this facility is June, excuse me, is July of 1998. Some of the key aspects of this facility moving through transition are the removal of the nitric acid which is anticipated in June. Some of you are probably aware of that environmental assessment that's out there currently, or will be soon, and also implementation of the preferred alternative to remove the spent fuel from that facility as well. We show a slide graph here of the costs of deactivation and the anticipated savings is the dash line. The

thin dashed line is the projected cost right now to run the plant the way it exists and the reason that it is slightly up is for inflation, if that is correct. And superimposed over that is the key aspects, if you will, the negotiation of the transition activities for the PUREX plant.

MB: Tom?

TT: Yes ma'am?

MB: To run the plant?

TT: Currently operating is.

MB: It's not running?

TT: The plant is in a hot operational standby if you will. It has a certain amount of systems that have to run to contain the materials, that are in the plant, in a stable configuration. The process of deactivating, or transitioning, this facility is to remove those elements, those risks, if you will, from the plant to get it to a situation where we don't have those large costs of maintenance and operating, and we have a very low risk, if you will, environmentally, low cost turnaround and that is projected to be in 1999, 1998, excuse me. So I guess I want to point out one last thing, that the cost of deactivation then would be, if you will, the thin line and the thick line over the period of years. Similarly the savings at the other end would be converse. The Fast Flux Test Facility is the U.S. Department of Energy's, one of the research reactors I believe for the breeder program. Some of the key aspects for the Fast Flux Test Facility transition include removal of the fuel from the plant, begin construction of the sodium storage facility, complete construction of the facility and drain the sodium out of the reactor. It's a liquid cooled sodium reactor and I believe the temperature to keep the sodium liquid is at 400 degrees fahrenheit, if I recall, so there's a large expense in keeping that material circulating through the plant, even though the fuel may not be in it, until such time as a place for storage is built. So, we're trying to get a fast track to get that done. Similarly, the cost profile is similar.

MB: (Could not hear question, not audible).

TT: Oh, the plant used for the sodium is going to be in a pre-treatment process for the Tank Waste Remediation System program. Now that is a study that's out there to be completed in 1998 and until such time, we're allowing the Department of Energy to manage that as product so that saves us any costs associated with permitting a facility such as FFTF until it absolutely, positively makes sense. And our intention is not to permit that facility, our intention is to permit the sodium storage facility, if at such time, the facility is determined to be a waste. It is slightly radioactive. Yes?

MB: (Could not hear question, not audible).

TT: Tank Waste Remediation Systems, or TWRS. There's a lot of acronyms in this business. And the Plutonium Finishing Plant. As you may know, the Plutonium Finishing Plant has currently interim stabilization activities occurring, such as the stabilization of the sludge that is in some of the glove boxes, removal of the 10L bottles, essentially the 10L bottles are poly jars and large protect containers with, I believe, plutonium bearing solutions in them and clean out the duct work associated with the plant.

The plutonium finishing plant also will be undergoing an environmental impact statement, and those are essentially some of the key aspects that we identified earlier in this part of this set of negotiations to establish what we would submit in the draft environmental impact statement, that I believe is on the next slide, and also the final Environmental Impact Statement Record of Decision. To run this plant in an environmental statement was determined by the Department of Energy and the result of stakeholder input and that's why it's important for us to be here tonight. Important for us to solicit values and comments from you folks and we hope you will do that. We have one more slide here, and it's essentially the work activities and schedules laid out for PFP. And what's not shown on here is the cost, and the cost currently is around $90 million a year. Thank you.

MB: What do you want us to comment on here tonight?

TT: What I would like you to comment on tonight is not necessarily my presentation, but what I would like you to comment on here tonight is this package. And I believe we have some over there to take home, we have mailed some of these out, I believe, to various interested stakeholders. I believe the Hanford Advisory Board as well as the Oregon Waste Board and this is what we're asking for people to solicit comments on.

MB: And if I haven't read that yet, is there another opportunity?

TT: Yes. If you haven't read this yet I would encourage you to call me, or Moses (Jaraysi, Ecology) or anyone from our staff who worked on the facility transition as well as the Department of Energy, Mr. Paul Krupin, and EPA, Mr. Doug Sherwood.

MB: Is there something in that book that will tell me how to do that?

DF: Right. Actually the comment period is really just beginning. We're in the first week of the comment period. It will run through March 30th and what you can do if you haven't had an opportunity to read the booklet -- I encourage you to take one. There is a person, Annette Carlson, and her address is in there. You can send the written comments if you do not want to make comments tonight.

I think one other significant thing that Tom didn't mention is I'm very proud of what we did in this negotiation. I think the Oregon Hanford Waste Board should be also interested in the three tribal nations are now going to be given status to where they'll receive all the documentation EPA and Ecology receives at the same time that the regulatory agencies get it. I think it's a big step in the right direction in getting full tribal involvement. What we've got now is just some informal questions and answers. If you have any questions we'll be glad to answer them and if you don't and you would like to make formal public comments what we would ask you to do is to identify yourself with your name and then your comments and then we'll record this and we'll give you written responses back and let you know how it influenced our decision. Are there any questions? If not it's going to be a real short meeting. Again we'll be happy to answer any questions and it doesn't necessarily have to pertain to facility transition. If you have any just general Hanford questions we'd be glad to answer those also.

DF: If somebody would like to see some of the slides to look at once more...

DF: Or we have a neat CD-ROM presentation over here too. Again.

MB: If one of you, and I don't mean to put you on the spot, but I would be interested to see if one of you could, in a nutshell, in short sentences, tell me what facility transition is, why you need to do it, just for starters.

DF: I would be glad to do that.

MB: Tom did a good job of telling us the technical information, but I would just like in a nutshell what it is you're trying to do, what you want us to do?

DF: In a nutshell, what I would state and we'll each probably state it differently so maybe we all can state it, to me facility transition is simply taking these big, old monoliths that were operating facilities, many of them still have full staff levels and are in a condition to run if need be, and moving them into a situation where minimal staff can operate them. You put them in a safe configuration, clean out the waste material out of the facility and leave it at that, and the final dismantling, or where it becomes another mission, will be determined down the road a little later. So that would be my nutshell. The reason that it's so important is because we're spending millions and millions of taxpayers' dollars keeping these facilities in a standby mode.

MB: (Not audible) . . . proposing to do and see if we agree that that's a reasonable approach.

DF: Right.

MB: Okay.

DF: I would ask you to really look at each facility and make sure it makes sense for each facility. I would almost say there are four different change packages in there, and globally, I think the concept is a good concept, but does it make sense for every facility? I think that's what we really want to know.

DF: Is this thing working yet? Okay.

PK: I guess I look at this as though I call this the third leg of the Tri-Party Agreement. They have the RCRA, the Superfund cleanup, and we have this universe of operating facilities out there. Facilities that have supported the nuclear production mission of the department for 45 years. Now that mission is over, and we have to do something with these facilities, and the process we've designed ingrates some very, very complex laws, and it tries to simplify it and involve all the regulatory agencies, who have some responsibility, delegated or vested by statue, whatever, and it tries to design a process where they all know what they're supposed to do, and they can do it efficiently to satisfy their mandated missions as regulating agencies, or regulatory agencies, or as public oversight. EPA and state look very closely at the regulations at emission control and about the management of materials that have potential to get to the environment, and this process literally identifies everybody's roles and responsibilities, and that includes stakeholders, the tribes, the National Environmental Policy Act process is integrated into this, too, and it really works in two basic cycles.

The first cycle of activity is to just take a look at the facility from where it's at, fully loaded with materials, hazardous chemicals, nuclear

materials. It's got lots of people working there, and they're maintaining it in the minimum safe condition, but it's still risk laden, and it had to be maintained. And what we've done is we've gone through and designed this process where everybody looks literally at the spaces, the tanks, what's in them, and comes to agreement in the milestone packages as to what needs to be done to take these materials out of the plant, manage them safely and bring every inch of the plant, regardless of where it's located, down to a safe, low-risk condition. That's the first cycle of activity.

Then it stays there until the rest of the risks at the Hanford site come down to about the same level, and then you enter the last phase. It's called disposition, and then you literally dismantle, or entomb these facilities, and that is an activity that people will get to someday. And what the process allows for is to periodically revisit these and compare the risks poised by these facilities in their low risk state to the other things that still need to be worked on at the Hanford Site with the limited dollars available. I think that's the remarkable thing about the process is that we've taken the Atomic Energy Act, RCRA, Superfund, RCRA Closure, there's all sorts of aspects to this where we had to identify and we had to come to grips with ways to resolve the regulatory tension between these things, these different laws.

Then each of the milestone packages: We've taken PUREX, the Plutonium Uranium Extraction Facility, bringing it right down to a condition that can stay safe, low-risk until we decide what to do with it. Same thing with the Fast Flux Test Facility. Now we're taking out the sodium, taking out the fuel, and we'll be able to just literally turn the key and walk away from it for a while. With PFP, we have an environmental impact statement. The decision to do the environmental impact statement was literally made in response to public comment, a desire that we go through a National Environmental Policy Act process. And once we get a decision out of that, we'll negotiate and do the same thing to the PFP that we've done to these other facilities.

MB: Is there any controversy over what you're proposing to do?

PK: Well, a lot of people don't know why we're not cleaning these things up all the way right now. And I think we've come to the conclusion that it really makes sense to put the taxpayers' dollars where they count the most, and that's on the risks. I think this is something we wrestled with even from a regulatory standpoint because the RCRA requirements push you to do it quick. What happens is that once you get into the low-risk state, you're spending a lot of money and you're not getting a whole lot out of it, while you really have a lot more that needs money spent on it to get it into that same low-risk condition. So this is one of the key points that came out of the process that we deferred RCRA closure, and it still has full regulator involvement and oversight, and if there's some new recognition of new risk, something leaks, some contamination is found, it can come up on a priority list. And I think that's inherent now in the process, that everyone is involved in making the decision of what to do next.

DD: A couple of times you describe the low-risk process. Can you describe what that means and how risky that is?

PK: Well, I call it -- is this working okay? -- I call it 'how clean is clean for now.' I don't believe we've done a correlative risk assessment on any of these end states that we've negotiated, or at least we plan to reach through the transition activities. I don't have a

quantitative answer in terms of cancer, or health risks. I do know, with the materials having been removed for the most part, in some cases there are still hazardous materials left in these facilities, there's still radiological contamination left in the facilities. It's not safe enough for the public to go in freely. There still are a need for controls and security to prevent the public from getting access to it, but the risk is low enough that we can keep the surveillance and maintenance down to the barest minimum. I think it comes down to annual or bi-annual inspection in many cases. Just going in and walking through the facilities to see that everything's still stable and nothing's falling apart.

DF: Dirk, I think that the key is that a low-risk facility then becomes a high-risk facility at some point-in-time as we found in the 100 Area now. We're having to tear down a lot of facilities because they kind of went through that dormant stage so long that now they're failing apart. So let's tear them down.

DB: The real risks long term are the deterioration of the facilities themselves. So that's one of the things that we deal with. We're not only dealing with trade-offs with dollars, we're dealing with trade-offs on worker health and safety risks. When these facilities were determined to be surplus, they turned the process off and left things in the buckets and all of the support systems, and people had to go and do the maintenance and do the safety-and-compliance monitoring. And that's another major issue. It's not simply a dollar issue. When you get the bad stuff out of the buckets and clean out the plant and get it so it's in this surveillance and maintenance mode, it really is in a maintenance mode, because you've got to keep it safe enough so that the worker health and safety risks don't go sky high when you actually want to tear the thing down. Recently, we've had one death because someone went onto the roof of Building 2 where it had been weakening and he fell through and died. So the issue of worker health and safety is a real one. There's the real short term one, there's a longer term one, and this is where trade-offs between public health and safety, which comes at risk if you don't do anything. So I think that there's good sound reason that there are some controversies in here, and they have to do with trade-offs with dollars versus health and safety.

Are we so preoccupied with doing dollars that we're not also going to do the transition of things that are high priority for worker health and safety? So far, it looks like we are. We don't know what's going to happen when the dollars get ratcheted down. We don't know what's going to happen when the transition facilities are finished. Is there going to be money there to go and take the same approach in doing the tanks? The most expensive mortgage on the site is not the facilities you're talking about, it's the mortgage on maintaining the maintenance and safety and compliance monitoring on the tanks. And in the face of that, the facility or the priorities have been changed around. Part of it is a good idea. The public involvement process with the Tank Waste Remediation System renegotiation said that the spent fuel should be one of the highest priorities because it's close to the river. It's got seismic vulnerability, and it really needs to be fixed up, or the fuel needs to get taken out of there quickly. The negotiation, the negotiators said no. Negotiators said we're going to make that a target milestone which is not enforceable, so at that point, spent fuel was No. 3. The transition facilities were second and the tanks were third.

We have seen in the last year those priorities change around, and the tanks are third now and coming closer to that maintenance mode and the

safety and compliance monitoring where you don't buy any safety. You just watch the thing deteriorate as it's going along, and so there is controversy because the controversy says what are you going to work on. The most expensive thing that can happen from my perspective is to continue the safety and compliance monitoring on the tanks as being considered now, because the mortgage is so high that the only thing that's going to happen is that you're going to spend a lot of money now and the real cost to clean up is going to be put back onto future generations.

DD: Back to the risks for just a moment. Would you agree, or would it be safe to assume that, for the risk that you're talking about, it's risk of catastrophe, not environmental safety and health risks?

PK: I think there would be risks on both avenues. I think that, as an industrial facility, there's always going to be potential for some sort of accident, and an industrial facility that's handling the types of materials that these facilities handle, I would guess that those would be even a higher percentage. But they surely are a much more dangerous situation, a much more riskier situation right now than they will be in four to five years and that's the intent.

DD: My concern is the way that you use the word risk, and you talk about low risk, is that it's probably very confusing to the public and what that really means. In this case, you're using risk in a much different way than it's used, say, by the Environmental Protection Agency when they're looking at what the risks are under the Superfund laws. That here the risk is an entirely different critter, and it's not comparable to the kind of things that EPA does. As an example, in the case of the PUREX facility, some of the dissolver cells -- my guess is based on what I've heard -- is that when this is in a shut down surveillance mode it will still be so dangerous that people would not be able to enter the areas of those dissolver cells. The radiation levels would just be enormous.

DD: I think you're absolutely right in trying to get at the difference between the perception of risk and most Superfund situations where it's environmental, and the type of risk that we're talking about here. Because we're talking about highly radioactive and hazardous chemicals inside these . . . (not audible) . . . facilities, or inside these new facilities. The primary risk, as they presently sit, is to the workers who have to go to the facility, No. 1. And, two, there are some effluent environmental emission issues which we are going to be bringing under risk as emissions occur, because we are taking the materials out of the facility. And three, yes, there is a catastrophic aspect to this worst-case scenario, because leaks, spills, seismic risks and all those things might do to a facility containing radiologic materials and hazardous chemicals. I think there are the three components.

PK: But again that raises the same concern that Mr. Belsey talked about a moment ago. Even looking at the health and worker safety aspects, you have a long-term mortgage cost, that it's going to be more expensive, perhaps, by waiting. The same thing holds true on the other environmental end of it, as well, where, by delaying, in a lot of cases it's going to increase the total cost over the long term.

TT: Yes. The principle driver behind negotiating this now was the recognition that, to maintain new facilities in their standby condition, costs a significant amount of money. It did not necessarily get analyzed in conjunction with, or in a way which related the Tank Waste Remediation System risks and the decisions that are being made to manage

the tank wastes program simultaneously, in an integrated fashion. I think there was an independent recognition that there are some very significant benefits to bringing these facilities down to that surveillance and maintenance point now. That recognition has been long standing, and it did result in the commitment by DOE with the EPA and Ecology in the Tri-Party Agreement in January 1994, which brings us to where we are now. That recognition and those decisions were made more than a year ago.

PK: May I add something? When we talked about integrating management approach language that we had inserted into this proposed tentative agreement here, it was for this very concern. How does the site manage itself as a whole? How does the site appreciate and understand one risk versus another, be it tank farms, spent nuclear fuel in K Basins, or the facilities such as Plutonium Finishing Plant where workers receive some of the highest dose at the site. We felt that from the states' perspective, Ecology's perspective, that language was crucial and important and an integral part of this agreement, because it gets the site to start talking as a whole and not as programs. And I guess that was the point that I wanted to make earlier, that we felt that this was very important and think it will provide some benefits in the future.

DD: Perhaps a little bit simpler question. It might be a little easier to answer. You've addressed what's going to happen with the Plutonium Finishing Plant and with the PUREX facility and with the Uranium Trioxide Plant and the Fast Flux Test Facility. Will the other facilities also go into the same process, the U plant, the T plant, the S plant, Redox, the Canyons, B plant, the . . . (not audible) . . . complexes and PUREX and the Evaporators and other associated facilities?

PK: The answer is it depends. What the agreement provides for is an agreement by the agencies, the three agencies, to decide what's a key facility. And the key facilities will go into the Section 14, the decommissioning process. If they contain the mixed waste, the hazardous and radioactive wastes, and agencies agree that that's the preferable way to manage their decommissioning, there are alternatives. The RCRA and the CERCLA processes.

TT: Paul, I want to add to that. For facilities that are currently covered under the Tri-Party Agreement, under the RCRA process or the CERCLA process, where we start first and that there may be an immediate need with a hot cell or a specific location on the site that may warrant scrutiny or additional, if you will, regulatory enticement.

DB: Let me turn the question a little bit around. This administration has talked about reinventing government and taking a business-like approach to government, and one of the things that business does is look at a return on investment. Now, it's been pretty easy for the folks at Richland, not really, but it's been easier for the people at Richland to tell the government that this is a good investment because they can invest an amount of money that will return to them approximately three years after the investment is finished and the facility is in a surveillance and maintenance mode. You don't have to be a space scientist to say that's a reasonable kind of return on investment, and I'm delighted that you guys have done that, and I think that it's a model for approaching the cleanup, essentially building a new mouse trap. None of us thought about the mortgage, neither among the DOE or among the stakeholders. Some of them did, actually. I'm sure Jerry Pollett has been obsessing on it for some time. But the rest of us didn't understand that, and the transition facility group has taken the

lead and said a mouthful for the rest of the cleanup and we've seen some of that thinking showing up in other programs. Spent fuel people are thinking that way, and they are a separate group. I think that that's a very important step forward, but again the issue that the dispersion of this is going to be the most difficult part. Can you keep on coming up with clear winners? People are already looking at FFTF and saying is it really worth investing $20 million a year extra for eight years or six years to get back money that's going to take you 10 years to recover your investment? That's not clear. Are the health and safety issues in the D plant and some of the other facilities going to be factored into this equation, or is it just going to be a financial kind of approach? That's not clear, and that's a very important distinction because some of the high risk areas may not immediately be addressed.

TT: I would like to add that I appreciate your comments sort of leading the way in terms of being fiscally responsible. We would also like to think we lead the way in some of the regulatory integration as well as the waste minimization processes as we go through transition facilities and really trying to get out of our box, if you will, and do some creative thinking. I think we have a ways to go. I think we learned a lot. We'll learn more as we go a long.

DF: Any other questions? Okay, again I want to encourage you to pick up one of the orange pamphlets over there that has the four change packages in it. It's also got the new language to the agreement, the legal language, and there's also other material there if you're interested. The *Hanford Update* is there. That's our newsletter that we put out, and I can never tell if it's bi-monthly, if that means it's every other month or not. It comes out at least six times a year, and if you're interested go ahead and sign up and we'll be glad to send that to you. It will keep you abreast of some of the activities that are ongoing. Again, we'll be here to answer your questions if you have any.

DB: I would like to put something in for the record from the Hanford Advisory Board. For those of you who don't know, the Hanford Advisory Board is an advisory board chartered under the Federal Advisory Committee Act. It's role is to oversee and advise the DOE, EPA and the state of Washington, really, but particularly the Department of Energy on issues concerning cleanup from the public's perspective. And the public is very well represented in many ways in this Advisory Board because it has 32 members, half of whom are from local interest groups and the other half are regional interest groups. The total board including alternates runs about 90 people, and it's a working board, and it has been turning out. It was started last January and has been turning out advice to the three parties over the last eight or nine months. And they have sent some advice to the Tri-Parties, you guys, or your bosses, or the people at the top have seen this, and some of you have been around when it's been asked. But I would like to put it into the record because it's directly relevant to the public's values about the running of the facilities that are going into transition and such.

Facilities transition, this was advice that was passed, adopted December 2, 1994, in a letter to John Wagoner and with copies to the regulators. Facilities transition one: All facilities should not be treated equally in terms of priority from making the investment to move into surveillance and maintenance mode. The investment should be examined in light of safety, projected cost savings and future reuse considerations. So really safety was first, the monetary savings was second, but also the issues of recycling of facilities, or reuse of facilities was, which is also an economical issue, has been dealt with here. And in fact, I

just heard the other day that the canister storage building, which was started on the Hanford site and has site . . . the foundation for the spent fuel storage facility, which will have to be built as part of getting the spent fuel away from the river.

Two: Higher priority should be given to those facilities with the highest pay back in terms of safety, projected cost savings, and future reuse. Three. High priority Hanford cleanup issues activities are being deferred, in part, because of the up-front costs related to facilities transition. These monies should not be lost. Out-year savings must be requested for Hanford cleanup. DOE must find a way to make this clean up investment possible and parenthetically for the other facilities. Four: The $120 million five-year investment in the Fast Flux Test Facility . . . and it says FFTF here but I try and steer away from the acronyms myself . . . should be reexamined as to pace and priority. Reprogramming from the Fast Flux Test Facility to higher Hanford priorities should be sought if far higher safety and legal cleanup priorities at Hanford face shortfalls. And the example at that time was spent nuclear fuel removal from K Basins. Five: The Department of Energy should not allow the cleanup budget to subsidize defense and energy programs. All transfers of defense programs, facilities or materials to the Environmental Restoration and Waste Management programs should be accompanied by a full commitment to funding at the time of transfer.

This includes funding for safely terminating the program, removing potential product materials and attaining a safe surveillance and maintenance mode. And this is a break from what's happened in the past. The fuel down in the K Basins got into that sorry state because it fell between the programmatic stovepipes and the fuel deteriorated and the minimal maintenance and the safety monitoring that was done was stolen from here there and the other place. In fact, it was a safety program, a defense production program, even though it came under Environmental Restoration or Waste Management because the plutonium in that fuel was still considered a national asset until I guess it was the 21st of December when the secretary signed a new order saying that plutonium and highly enriched uranium recovered in the process of cleaning up these facilities would not be used for nuclear explosive purposes.

The Facilities Transition budget must be based on legal compliance with applicable hazardous waste and environmental statutes, including safety and hazardous materials training. Again, worker health and safety are paramount among the concerns of the Hanford Advisory Board. Thank you.

DF: Any other comments?

DF: Jack, can we get you to use the microphone? It's probably important to get it on.

JW: I understand, but it's a very important point. I'm talking about the safety of the other facilities that aren't yet in a program.

DF: Thanks. Okay, well if there's nothing else, I think we'll adjourn.

DF: We thank you all for coming and again DouGlas (Palenshus, Ecology) would love to demonstrate the CD-ROM over here.